

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**ERFINDERGEMEINSCHAFT UROPEP
GbR,**

Plaintiff,

vs.

**ELI LILLY AND COMPANY, and
BROOKSHIRE BROTHERS, INC.,**

Defendants.

CIVIL ACTION No. 2:15-cv-01202-JRG

JUDGE: HON. RODNEY GILSTRAP

**DEFENDANT ELI LILLY & COMPANY.'S UNOPPOSED TO SEAL EXHIBITS 1 AND
4 TO ITS OPPOSITION TO PLAINTIFF'S MOTION FOR ONGOING ROYALTIES**

Defendant Eli Lilly & Company ("Lilly") files this Unopposed Motion to Seal Exhibits 1 and 4 to its response to Plaintiff's Motion for Ongoing Royalties (Dkt. 370). Exhibits 1 and 4 both contain Lilly's highly confidential financial and licensing information. Counsel for Lilly have designated both of these exhibits HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY their entirety. Thus, Lilly maintains that good cause exists to seal Exhibits 1 and 4 to Lilly's response to Plaintiff's Motion for Ongoing Royalties in order to retain secrecy in regard to information that is highly confidential. To this end, Lilly respectfully asks the Court to seal Exhibits 1 and 4 to Lilly's Response to Plaintiff's Motion for Ongoing Royalties. Lilly has conferred with counsel for Plaintiff, and this motion is unopposed.

June 2, 2017

By: /s/Jon B. Hyland

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**CERTIFICATE OF
SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 2nd day of June, 2017.

/s/ Jon B. Hyland

Jon B. Hyland

**CERTIFICATE OF
CONFERENCE**

The undersigned certifies that on June 2, 2017, counsel for Plaintiff and counsel for Defendants conducted a conference with Plaintiff's counsel regarding the above motion. During this conference Plaintiff informed Defendants that this motion is **UNOPPOSED**.

/s/ Jon B. Hyland

Jon B. Hyland